APPLEBY
Appl. No. 10/509,085
December 7, 2007

REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested.

A new more descriptive title has been effected by the above amendment.

Claim 15 has been amended so as to obviate the outstanding rejection under 35 U.S.C. §101.

The specification, Abstract and claims have all been reviewed and amended above so as to also obviate all outstanding formality-based objections.

Accordingly, all outstanding formal issues are now believed to have been resolved in the applicant's favor.

The rejection of claims 1-14, 16 and 17 under 35 U.S.C. §102 as allegedly anticipated by Nii '765 is respectfully traversed.

The Examiner refers primarily to Nii at Figures 3, 15A and 15D (discussed in column 26) and to text at column 6, 8, 11-15 as the most relevant parts of Nii. As a matter of law, it is impossible for a reference to anticipate any claim unless it teaches each and every feature of that claim.

Applicant's independent claims have been amended above so as to insure patentable distinctness from the Nii reference. In particular, applicant's claims now explicitly require rejection of pairs of source language words and target language words in the event that such pairs would result in it not being possible to decompose the source and target text into translation units which can be used for translation.

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One advantage of systems according to embodiments of the present invention over the prior art is that they enable possible translation units to be stored in an efficient, compact form. Such systems apply an automatic process to select the subset of these possible translation units, according to the defined selection and subsequent rejection criteria set out in the independent claim above, which enable the necessary number of distinct translation units to be minimized. Without the compact storage and efficient means for generating all possibilities, such an automated technique would not be possible.

A section describing the inference of new translation units according to applicant's system and method starts on page 26, line 29 of the specification. While this section mainly includes a description of a fairly 'brute-force' type selection from a potentially huge number of translation possibilities, it goes on to provide a description of a graph topology filtering technique which may be used to check that source and target analyses were indeed decomposable into translation units. The wording newly-incorporated into the independent claims above is based on the wording used in the description of the "isomorphism test" described on pages 30 and 31 of the specification, and specifically on the wording in the penultimate paragraph of page 30.

Given this patentable distinction from Nii now recited in all independent claims, it is not believed necessary to discuss further deficiencies of Nii with respect to other features of the independent claims or the added features of the rejected dependent claims.

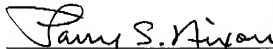- 13 -

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Accordingly, this entire application is now believed to be in allowable condition

and a formal Notice to that effect is respectfully solicited.

Respectfully submitted,

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